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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PENDLETON DIVISION

| | |
|-----------------------------------|------------------------|
| OREGON FIREARMS FEDERATION, INC., |) Case No. |
| et al, |) 2:22-cv-01815-IM |
| |) (Lead Case) |
| Plaintiffs, |) Case No. |
| |) 3:22-cv-01859-IM |
| vs. |) (Trailing Case) |
| |) Case No. |
| TINA KOTEK, et al, |) 3:22-cv-01862-IM |
| |) (Trailing Case) |
| Defendants. |) Case No. |
| |) 3:22-cv-01869-IM |
| MARK FITZ, et al, |) (Trailing Case) |
| |) |
| Plaintiffs, |) |
| |) |
| vs. |) |
| |) |
| ELLEN F. ROSENBLUM, et al, |) |
| |) VIDEOCONFERENCE |
| Defendants. |) DEPOSITION OF |
| |) MICHAEL SIEGEL, M.D. |
| KATERINA B. EYRE, et al, |) |
| |) Taken in behalf |
| Plaintiffs, |) of the Plaintiffs |
| |) |
| vs. |) March 17, 2023 |
| |) |
| ELLEN F. ROSENBLUM, et al, |) |
| |) |
| Defendants. |) |
| |) (All participants |
| DANIEL AZZOPARDI, et al, |) appeared via |
| |) videoconference.) |
| Plaintiffs, |) |
| |) |
| vs. |) |
| |) REPORTED BY: |
| ELLEN F. ROSENBLUM, et al, |) Ashley L. Aronson |
| |) Court Reporter |
| Defendants. |) |
| |) |

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Also Present: (None)

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1 we used for classifying states as having a state-level
2 permit requirement is simply that the state requires a
3 permit, a state permit for the purchase and possession
4 of firearms.

5 Q. In your review of those -- of the literature
6 and your research, did you consider any of the
7 differences between those state permitting schemes and
8 how that would affect your opinion?

9 A. No, I'm not aware of any studies that have
10 looked at details about how the permitting scheme is
11 specifically done to try to differentiate, you know,
12 whether there are certain features of the permit
13 requirement that have differential effects.

14 Q. So do you have an opinion as to whether
15 particular details of a state permitting scheme are
16 more or less important, essential to your conclusion
17 about reduction of homicides and mass shootings?

18 A. I don't believe that they are that important
19 because the evidence is quite robust from multiple
20 studies that have looked at multiple states, and we're
21 not seeing discrepancies in the research so we're not
22 seeing, you know, in one state there was an effect and
23 another state there wasn't an effect.

24 Pretty much in every state that's been looked
25 at there has been an effect, so my opinion would be

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1 that there is no reason to believe that details about
2 the permitting system are going to change my opinion
3 about its effectiveness.

4 Q. So, for example, if different state law
5 permitting schemes have different periods of time
6 between how long it takes to apply for and obtain a
7 permit, that in your opinion wouldn't change your
8 conclusion in this case --

9 A. No.

10 Q. -- is that right?

11 A. It wouldn't because, again, the evidence is
12 so robust. The effect sizes are huge and the number
13 of studies that were done in very different states
14 that had very different details, none of that seems to
15 make a difference. These studies are finding a large
16 effect pretty much across the board.

17 Q. In your view in reviewing the permitting
18 schemes for the purchase and possession of firearms,
19 are there any elements of those schemes, and we can
20 get into it more specifically, that are more or less
21 important to you in your conclusion that they reduce
22 homicides and mass shootings?

23 In other words, these schemes have a lot of
24 different pieces to them. Is there any core
25 components that to you make up the effective part of

Michael Siegel, M.D. - 3/17/2023

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C E R T I F I C A T E

STATE OF OREGON)
)
 COUNTY OF MULTNOMAH)

I, Ashley L. Aronson, a Notary Public in and for the State of Oregon, certify that the videoconference deposition of MICHAEL SIEGEL, MD, occurred at the time and place set forth in the caption hereof; that at said time and place I reported in Stenotype all the testimony adduced and other oral proceedings had in the foregoing matter; that thereafter my notes were reduced to typewriting under my direction and the foregoing transcript, pages 1 through 98, both inclusive, contains a full, true and correct record of all such testimony adduced and oral proceedings had and of the whole thereof. Reading and signing was not requested pursuant to FRCP Rule 30(e).

Witness my hand and Notarial seal at
 Portland, Oregon, this 24th day of March, 2023.



Ashley L. Aronson

 ASHLEY L. ARONSON
 Notary Public for the State of
 Oregon, residing at Portland
 Commission No. 1028978
 My Commission Expires: 9/28/2026

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